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Foundation Partners Group, LLC

21
22 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

23 AFTER SERVICES, INC., a Delaware
corporation,

24 Plaintiff,

25 vs.

26 FOUNDATION PARTNERS GROUP, LLC,
27 a Florida Limited Liability Company

28 Defendant.

Case No. 2:24-cv-01207-JCM-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

(First Request)

1 Plaintiff After Services, Inc. (“Plaintiff”) and Defendant Foundation Partners Group, LLC
2 (“Defendant”) (together, the “Parties”) hereby agree and stipulate as follows:

- 3 1. On Friday, March 14, 2025, Plaintiff filed a motion to compel. (ECF No. 74.)
- 4 2. Per the Court’s Minute Order, dated February 24, 2025, responses to motions to
5 compel are due four (4) days after the motion is filed and served and replies are due two (2) days
6 after the response is filed and served. (ECF No. 64.)
- 7 3. To accommodate the Spring Break holiday and to allow additional time for
8 Defendant’s counsel to confer with Defendant, Defendant has requested, and Plaintiff has agreed,
9 to provide Defendant a one (1) week extension of time for Defendant to file and serve its response
10 to Plaintiff’s pending motion to compel (ECF No. 74), from March 18, 2025 to March 25, 2025
11 on the condition that: (a) Defendant, solely for the purpose of attempting to reach a resolution of
12 the present discovery dispute without court involvement, agrees in this instance to identify by
13 Bates Number any documents Defendant alleges it has already produced that are responsive to
14 the pending motion to compel, (b) Defendant agrees not to include a request for an award of
15 attorneys’ fees or costs in its response to the pending motion to compel; and (c) Plaintiff shall
16 have up to and through Monday, March 31, 2025 to file and serve its reply in support of its motion
17 to compel.
- 18 4. The parties agree that the Spring Break holiday and Defendant’s counsels’ need to
19 confer with Defendant constitutes good cause for the requested extension of time.
- 20 5. This is the parties’ first request for an extension of time with respect to Plaintiff’s
21 motion to compel (ECF No. 74).

22 **IT IS SO AGREED AND STIPULATED:**

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 3/19/2025